

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

[1] GLEN CASADA  
[2] CADE COTHREN

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No. 3:22-cr-00282

JUDGE RICHARDSON

**GOVERNMENT’S MOTION FOR LEAVE TO FILE UNDER SEAL AND EX PARTE**

The United States respectfully requests leave to file a motion under seal pursuant to Administrative Order No. 167-1, Section 5.07. Specifically, the government asks leave to file under seal a motion pursuant to Federal Rule of Criminal Procedure 16(d)(1), which authorizes the Court to, among other things, restrict discovery upon a showing of good cause. The Rule contemplates that the showing of good cause may be made “by a written statement that the court will inspect *ex parte*.” *Id.*

Aside from the text of the Rule explicitly authorizing *ex parte* filings, the proposed motion here discusses matters which are ongoing; involve confidential human sources; and/or involve uncharged derogatory information that the government does not intend to prove at trial. The factual bases justifying the *ex parte* request are further developed in the motion itself.

The government will file as an exhibit to its motion a version of its *ex parte* request which redacts sensitive material.

Respectfully submitted,

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Attorney for the United States  
Middle District of Tennessee  
Acting Under Authority Conferred by 28  
U.S.C. § 515

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